



September 1, 2016

Environmental Protection Agency (EPA)
ATTN: Harbor Comments
U.S. EPA
805 SW Broadway, Suite 500
Portland, OR 97205

harborcomments@epa.gov

Subject: Working Waterfront Coalition comments on EPA Proposed Plan Remedy for Portland Harbor

The Working Waterfront Coalition (WWC) appreciates the opportunity to provide these comments to EPA's Proposed Plan for cleanup of the Portland Harbor. Established in 2005, the Working Waterfront Coalition is an organization of businesses dedicated to ensuring the environmental health and economic vitality of the Portland Harbor. The WWC membership consists of companies representing a broad spectrum of industrial activities in the Portland Harbor.

Portland's Harbor is Oregon's largest seaport and a vital employment area: home to thousands of valuable high-wage, high-benefit jobs. Businesses in the Portland Harbor have consistently provided middle income jobs to diverse communities for more than a century. Many WWC members are filing additional technical comments on the Plan. This comment letter provides an overview of the economics of the Portland working harbor and highlights a few significant concerns with EPA's Proposed Plan.

Economics of Portland's Working Harbor

The WWC is collectively concerned about the impact of the proposed preferred alternative on the operating businesses in the Harbor and believe EPA's process would benefit from a better understanding of these employers. Portland's Working Harbor is the deep water shipping channel and surrounding marine, commercial, industrial and transportation infrastructure along the Lower Willamette River, from about the Broadway Bridge to marine Terminal 6 on the Columbia River. The Portland Working Harbor includes public and private marine terminals, industrial parks, and other commercial and warehousing businesses. The Port of Portland conducted/sponsored a study that presents the economic impacts of the terminals and firms located within Portland Harbor. [http://www.workingwaterfrontportland.org/pdfs/Portland Working Harbor EI Study.pdf](http://www.workingwaterfrontportland.org/pdfs/Portland_Working_Harbor_EI_Study.pdf)

Key findings of this study include:

- Approximately 30,000 people are directly employed in the working harbor, with an average salary of \$51,000.
- As the result of local purchases by the directly employed workers, an additional 19,000 induced jobs are supported in the local economy to provide goods and services to those directly employed.
- 16,000 indirect jobs are also supported in the local economy as the result of the local purchases of goods and services by the firms located within the Portland working harbor. These purchases could include equipment, maintenance, repair, and supplies.
- The business activity located within the Portland working harbor created \$4.2 billion of direct, induced and indirect personal wage and salary income and local consumption expenditures for Portland metropolitan residents.
- Businesses located within the Portland working harbor received \$12.6 billion of direct business revenue.
- A total of \$413 million of state and local tax revenue was generated by activity in the Portland working harbor in Fiscal Year 2015.

Who's Employed in the Harbor and What Do They Do?

The marine industrial harbor businesses support a diversity of jobs that rely on a variety of skills and education levels. Most of the harbor businesses provide jobs with low barriers to entry and offer skill training for career advancement. The following businesses represent the variety of jobs provided in Portland harbor.

Schnitzer is a global leader in the collection, processing, and sale of the world's most recycled product: steel. They process scrap metal and manufacture finished steel products from the scrap. Each year Schnitzer diverts millions of tons of end of life metals from landfills. According to EPA, recycling scrap metal results 74% energy savings, 90% savings in virgin material use, 40% reduction in water, and 97% reduction in mining wastes. 300 workers are employed in the Oregon facilities.

EVRAZ operates the only plate mill in the western U.S. with a current workforce of about 400. EVRAZ produces steel plate, steel coil and large diameter pipe for energy, military and infrastructure projects.

Vigor is the leading provider of shipbuilding, ship repair and complex metal fabrication in the Pacific Northwest and Alaska. Vigor serves a diverse set of industries including marine, defense, aerospace, traditional and renewable energy, bridge and infrastructure, employing 2400 skilled artisans.

Gunderson is a leading supplier of transportation equipment and services to the rail and marine industries. Gunderson is equipped to build all types of river and ocean going barges and is the largest manufacturer of double stack intermodal and box cars in North America. 1000 employees with 17 different languages comprise Gunderson's workforce.

Advanced American Construction is a full service general contractor providing heavy civil/marine industrial, diving, underwater marine survey, demolition and engineering services to public and private clients throughout the western United States. 110 individuals are employed by this work.

As noted, the marine industrial businesses in the harbor have a significant impact on local business in this region. A 2013 study of the Economic Linkages from Marine Industrial businesses, <http://www.valueofjobs.com/pdfs/2013-Analysis-trade-based-business-FULL.pdf> Projected that \$1.29 billion was spent in a two year period procuring materials, capital/plant equipment and services to produce their final goods and services and fifty percent of that was spent on local firms. More than 290 local firms outside of the Portland harbor were identified as businesses that provided material or services to the harbor businesses on a regular basis.

Key concerns with EPA's Proposed Plan

The WWC believes any cleanup remedy must be rational, able to be implemented and pragmatic. Unfortunately, EPA's Proposed Plan and the underlying Feasibility Study largely fails to meet these thresholds. Overall, EPA's Proposed Plan is not based on accepted science, is overly qualitative and lacks a transparency that is necessary for a clean-up project where the primary cost burden will be borne by local businesses, governments and ratepayers. An appropriate cleanup is a plan that is protective, cost effective and can be implemented in a reasonable amount of time.

The costs to clean up Portland Harbor are significant, and the true costs of EPA's preferred alternative could be more than double the \$800 million price tag that EPA estimates in its Proposed Plan. The WWC is extremely concerned about the impacts of the cost of cleanup to the region. Diverting capital to this cleanup effort will mean employees cannot be hired or retained, that other capital investments cannot be made, and that operational and infrastructure efforts will be scaled back or indefinitely delayed. EPA's reliance on unrealistic cost and duration assumptions in its Proposed Plan, such as the expectation of 24 hour/day dredging, six days/week, make it impossible to perform an accurate analysis of the cost effectiveness of the proposed remedy. The Portland region deserves to understand the true and accurate costs of cleanup, and EPA has failed to provide that transparency.

The WWC struggles with the expectation that the targeted cleanup levels can actually be achieved in an urban waterway. EPA uses remediation goals that do not adequately consider sources of contaminants coming into the system from upstream of the Portland Harbor. After cleanup fish advisories will remain in the Lower Willamette, given the ongoing need for mercury advisories that are established by the Oregon Health Authority and unrelated to sources within the Harbor.

The WWC is also perplexed by the inclusion of riverbanks in the proposed plan, calling into question the longstanding division of leadership between the Oregon Department of Environmental Quality (DEQ) and EPA. EPA fails to acknowledge that upland source control efforts through DEQ oversight has yielded significant and quantifiable improvements to in-river sediments conditions. The WWC urges EPA to clarify that DEQ will continue to manage the ongoing upland cleanup in the harbor and acknowledge the impacts of these efforts in the EPA's Record of Decision (ROD).

Finally, EPA needs to fully consider the significant consequences for Portland's local community, active working harbor, quality of life and Oregon's economy that result from the Portland Harbor Proposed Plan preferred alternative for cleanup. EPA's preferred cleanup alternative needs to be cost effective and proportional to realistic assessment of the benefits that will justify the significant diversion of resources to clean up actions.

The Superfund process has clouded business growth in the Harbor for a long time. Cleanup decisions in Portland Harbor need to happen using thoughtful analysis based on good science while being mindful of the overall economic impacts on the region's economy. The WWC looks forward to the economic development opportunities created when that cloud is lifted.

Sincerely,
WORKING WATERFRONT COALITION

A handwritten signature in black ink that reads "Ellen Wax". The signature is written in a cursive, flowing style.

Ellen Wax
Executive Director

Established in 2005, the Working Waterfront Coalition, with its extensive knowledge of harbor industry needs and active industry participation, is dedicated to working with its partners to ensure an appropriate balance between environmental concerns and the needs of river-related, river-dependent employers. Portland's Harbor is a vital employment area: home to thousands of valuable high-wage, high-benefit jobs. In addition, WWC members are conscientious stewards of the environment, making significant investments in the harbor consistent with state and federal laws.